

I wish to express OPPOSITION to RM-11306. The principal reasons for my position are the following.

RM-1306 would establish a burdensome method of establishing sub-bands based on bandwidth.

How are we amateurs to prove compliance with bandwidth limitations? The easy answer lies in type testing and acceptance by the Commission, but that is an illusion. Such testing proves only that equipment *can be* operated within some stated bandwidth. In practice, bandwidth depends on how equipment is actually operated and maintained. As to improper equipment set-up, the evidence abounds, especially during contests and DX pileups. Most amateurs are incapable of maintaining modern transceivers and, with the proliferation of new models, support from manufacturers is often unavailable at an age when problems begin to appear. Of course, testing is not applicable to home-made transmitting equipment. It appears that some form of monitoring will be needed, but what? One wonders if the League trying to foster new commercial activity and the advertising sales that will result?

How might the Commission monitor and enforce bandwidth limitations? Is the effort a worthwhile use of resources? Even if active enforcement is not contemplated, it is easy to envision an endless stream of complaints from disgruntled amateurs alleging interference due to excessive bandwidth. Some complaints would no doubt be well-founded. But, if present behavior is any indicator, many complaints will result from nothing more than self-centered intolerance. Ample support for this dire prediction is found most every evening on the (over crowded) 75 meter phone band, where shouting matches routinely taken on themes like the following: AM-ers are bums! Slop-bucketers are appliance operators! We've used this frequency for "x" years, so you have no business being here! And so on.

ARRL does not speak for the amateur radio community in proposing RM-11306.

All of the commentary I've heard suggests that RM-11306 was the result of "back room" maneuvering by a small group of people. The League did not solicit input or ratification from its membership. Instead, it seems that the League is prepared to "sell out" the great majority of amateur radio operators in order to promote digital modes that are neither needed nor wanted by more than a handful of people.

RM-11305 offers a better approach to the present sub-band mess.

The tragedy of RM-11306 is that it ties much needed reform to measures that are needless, unwanted, and beneficial to only a small special interest group. My operation and the following observations are limited to the 80 meter band. Absent special events, the ratio of ongoing phone QSOs to QSOs involving other modes is easily ten-to-one at any time of day. Phone QSOs generally involve several participants, and the required bandwidth is far greater than many other modes (especially CW). All of these factors suggest that the phone operation should be allowed across at least 90% of the 80 meter band. Yet phone is restricted to 50% of the band. There is no way to justify this imbalance. The severe over crowding that results is the root cause of poor behavior that is becoming all too widespread.

The needed change is provided in RM-11305 without the problems that attend allocation by bandwidth. The main opposition to RM-11306 seems to be fear of an ensuing "free for all". Surely some growing pains will be experienced, but similar problems attend RM-11305. The beauty of RM-11305 is that it provides the regulatory framework within which the amateur radio community can solve its own problems.

Thank you for the opportunity to be heard on this important matter.

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